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April 14, 2015

To: Federal Elections Commission, Reports Analyst Division

From: Commonwealth Altadis, Inc. Employee Political Action Committee (CAEPAC) (Id# C00455600)

Re: Response to April 5, 2015 Request for Information (Response Due Date 5/11/2015)

The FEC has requested information related to a CAEPAC Contribution to Thom Tillis Committee dated 11/14/14 and reported

on CAEPACs 30 Day Post General Report (10/16/2014 11/24/2014).

As indicated by the FEC, the contribution was reported as designated to the 2014 General Election; however the contribution was reported as being made after the General Election date. As the FEC states in its 4/5/2015 letter, contributions may not be designated for an election which has already occurred unless the funds are to be to reduce a candidate committees debts...

CAEPAC intended to make this contribution to the debt retirement of the candidate committee, but failed to designate the check correctly. The Thom Tillis Committee recognized the problem with the designation, never deposited the check, and sent the check back to CAEPAC within days of initial receipt. I refer to the following timeline for clarification:

November 4: General Election Day

November 14: Date of Issue of Check for Thom Tillis Committee (TTC)

November 21: Check Received by TTC

November 22: Letter and Check returned by TTC to CAEPAC. TTC indicates it cannot accept the check because it was designated for the 2014 General after that election had occurred, and requests either a new contribution for 2014 debt reduction or for 2020 Primary. (For unknown reasons, the TTC letter is never received by CAEPAC)

February 19: After conducting bank reconciliation, CAEPAC inquires as to why TTC has not deposited check.

February 27: TTC responds to CAEPAC that the check was returned in November, and provides electronic copy of the transmittal letter returning the check.

March 23: CAEPAC records a \$5,000 negative disbursement for TTC to reflect the cancelled check. This transaction will be reported on our mid-year report in July 2015.

March 23: CAEPAC issues a new contribution to TTC for 2014 Debt Retirement.

Please let me know if the FEC requires additional information regarding this request for information.

John F. Ostronic

Treasurer, CAEPAC